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7 IN THE UNITED STATES BANKRUPTCY COURT
8 EASTERN DISTRICT OF CALIFORNIA
9 FRESNO DIVISION

10 In re

11 TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE REGIONAL
12 MEDICAL CENTER,

13 Debtor.

14 Tax ID #: 94-6002897
15 Address: 869 N. Cherry Street
Tulare, CA 93274

CASE NO. 17-13797

Chapter 9

DC NO.: WW-29

Date: N/A
Time: N/A
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13
Judge: Honorable René Lastreto II

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19 APPLICATION FOR EX PARTE ORDER AUTHORIZING FRBP 2004 EXAMINATION
AND PRODUCTION OF DOCUMENTS
20 (LEVINSON ARSHONSKY KURTZ)

21 TO THE HONORABLE RENÉ LASTRETO II, UNITED STATES BANKRUPTCY
22 JUDGE:

23 TULARE LOCAL HEALTHCARE DISTRICT, dba TULARE REGIONAL MEDICAL
24 CENTER ("TRMC" or "Applicant"), Debtor in the above captioned Chapter 9 bankruptcy
25 proceeding, hereby files this Application for Ex Parte Order compelling Levinson
26 Arshonsky Kurtz, LLP, to produce certain documents for inspection and copying and, if
27 requested, to appear for a FRBP 2004 Examination.

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Levinson Arshonsky Kurtz
15303 Ventura Blvd # 1650
Sherman Oaks, CA 91403

Applicant represents as follows:

1. TRMC filed a voluntary Chapter 9 petition on September 30, 2017.

2. TRMC has reason to believe that Levinson Arshonsky Kurtz, is in possession of information needed by TRMC which affects the rights of TRMC as well as the administration of this bankruptcy estate.

3. TRMC believes that the information needed bears upon the acts, conduct, or assets and liabilities of TRMC.

4. The examination will also relate to the operation of the TRMC's business and the desirability of its continuance, the source of any money or property acquired or to be acquired by TRMC for purposes of consummating a plan and the consideration given or offered therefore, and any other matter relevant to the case or to the formation of a plan.

5. Conducting such examination will assist TRMC in protecting its interests in evaluating any plan that may be advanced and in furthering the administration of this Chapter 9 proceeding.

6. By this Application TRMC requests that it be permitted to compel the production of documentary evidence in the manner provided in FRBP 9016 followed by an examination, if requested, of Levinson Arshonsky Kurtz.

7. By the requested Order Applicant will proceed to have issued a Subpoena for Rule 2004 Examination with Production of Documents to be followed by the examination of the witness, if documents are requested, no earlier than 10 days after the date of issuance of the examination order or subpoena, whichever is later.

WHEREFORE, Applicant prays as follows:

A. The Court enter Order pursuant to FRBP 2004 authorizing the examination of Levinson Arshonsky Kurtz;


1 B. The Court enter an Order pursuant to FRBP 2004 authorizing the issuance
2 of a Subpoena for Rule 2004 Examination with Production of Documents; and

3 C. For such other and further relief as is just and proper.

4 Dated: March 30, 2018

WALTER WILHELM LAW GROUP,
a Professional Corporation

By:


Riley C. Walter, Attorneys for Debtor,
Tulare Local Healthcare District, dba
Tulare Regional Medical Center